Matthew G. Monforton (Montana Bar # 5245) Monforton Law Offices, PLLC 32 Kelly Court Bozeman, Montana 59718 Telephone: (406) 570-2949 E-mail: matthewmonforton@yahoo.com

Nicholas R. Barry\*
Ian Prior\*
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Avenue S.E. No. 231
Washington, D.C. 20003
Phone: (202) 964-3721
nicholas.barry@aflegal.org
ian.prior@aflegal.org
\*(pending approval of pro hac vice admittance)

Attorneys for Plaintiff Johnathan Talbot

## UNITED STATES DISTRICT COURT DISTRICT OF MONTANA BUTTE DIVISION

JOHNATHAN TALBOT,	
	) Case No. CV-23-66-BU-BMM
Plaintiffs,	
V.	) MOTION FOR IAN PRIOR TO
	) APPEAR PRO HAC VICE
MANOAH AINUU, and THE NORTH	)
FACE APPAREL CORP., a Delaware	)
Company,	)
Defendants.	
	)

Plaintiff, by and through his attorney, Matthew G. Monforton, hereby moves this Court for an order admitting Ian Prior pro hac vice by the Affidavit of Ian Prior, attached hereto as **Exhibit 1**. An additional affidavit in which Mr. Prior affirms his commitment to be bound by the Montana Rules of Professional Conduct and be subject to the discipline authority of Montana is attached to **Exhibit 1**.

I am an attorney for Johnathan Talbot. I am a member of the Bar of this Court and will act as local counsel. This Court and opposing counsel may readily communicate with me or co-counsel regarding the conduct of this case, and I, together with my co-counsel, will be responsible for participating in this case as required by Local Rule 83.1(d)(5).

Therefore, I request that this Court grant this Motion for Admission Pro Hac Vice and allow Ian Prior to participate as co-counsel for Plaintiff.

DATED: November 21, 2023 Respectfully submitted,

/s/ Matthew G. Monforton
Matthew G. Monforton
Attorney for Plaintiff

## CERTIFICATE OF COMPLIANCE PURSUANT TO L. R. 7.1(d)(2)(E)

I hereby certify that this document, excluding caption, tables, and certificate of compliance, contains 387 words, as determined by the word processing software used to prepare this document, specifically Microsoft Word 2007.

DATED: November 21, 2023 Respectfully submitted,

/s/ Matthew G. Monforton Matthew G. Monforton Attorney for Plaintiff

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 21st day of November, 2023, that a copy of the foregoing will be delivered this day via the Court's ECF system to counsel for Defendant.

DATED: November 21, 2023 Respectfully submitted,

/s/ Matthew G. Monforton Matthew G. Monforton Attorney for Plaintiff